

EXHIBIT “1”

K. WALD

1 A. Yes. I signed it.

2 Q. Now in this detailed description of accomodation
3 request you state, reduced travel time with the position
4 closer to her home or job hours more conducive with
5 adequate rest/decreased stress will prevent absences at
6 work and will allow for M.D. visits in her free time; is
7 that correct?

8 A. Correct.

9 Q. So is it fair to say that you were requesting
10 less work hours in this accomodation request?

11 A. No.

12 Q. Why not?

13 A. Because I didn't want fewer work hours; I just
14 wanted a more consolidated space or time so I could rest in
15 between.

16 Q. So what did you mean when you said job hours more
17 conducive to adequate rest/decreased stress?

18 A. So my program was split, okay. So that I have to
19 work a far distance, leave early in morning, get home, have
20 a little time to rest and then work four nights a week. So
21 I wanted a schedule where I would have to either travel
22 less or work more hours in one place so I wouldn't be
23 running around all the time.

24 Q. Is it possible that this could be construed as
25 meaning less hours because you requested job hours more

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1 conducive to adequate rest?

2 MS. KAPITONOVA: Objection to form. You can
3 answer. If you can understand that question you
4 can answer.

5 A. I don't know how someone else can construe it.

6 Q. So you were not requesting to work less hours?

7 A. No. I wasn't requesting to work fewer hours, and
8 the negotiations afterwards -- the people negotiating for
9 me were also told that I didn't want fewer hours.

10 Q. You said the people negotiating for you. Who are
11 you referring to?

12 A. It was the union and Brewton.

13 Q. Who from the union are you referring to?

14 A. Tom Bennet.

15 Q. What did Tom Bennett say on your behalf?

16 A. I don't know. I wasn't privy to the conversation
17 but I told him that I didn't want fewer hours. I wanted a
18 schedule where I would be less susceptible to travel all
19 over the place and not all the time. And I was taking
20 anti-virals and all the chemotherapy and if your riding the
21 trains for an hour each way and then late at night, I was
22 more susceptible. Given the prior year, respiratory
23 infections on an ongoing basis, I was scared.

24 Q. Do you have any e-mails from Tom Bennet to
25 Mr. Brewton regarding your accomodation request?

K. WALD

1 A. This is a schedule from 2015-2016.

2 Q. So would this be the schedule form that you
3 submitted at the hiring hall on Monday, June 29, 2015?

4 A. This was the schedule that I was given.

5 Q. After you had made your request to change your
6 schedule for the 2016 school year?

7 A. Right. There wasn't much for me to choose from.
8 This was the schedule.

9 Q. Okay. So this was the schedule that you decided
10 upon at the hiring hall?

11 A. This was the schedule that was available to meet
12 my needs.

13 Q. This was the schedule available to meet your
14 needs that was given to you at the hiring hall?

15 A. Yes. My teaching hour needs.

16 Q. So your schedule for the 2015-2016 school year
17 was effectively finalized at the hiring hall, correct?

18 A. When does that mean?

19 Q. That your schedule was decided on at the hiring
20 hall. This was the date that it was locked in?

21 A. Right. But, you know, things change.

22 Q. I'm sorry?

23 A. Things change.

24 Q. Right. I'm saying at the time when you signed to
25 accept this schedule for the 2015-2016 schedule that was